

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LEON WEINGRAD, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

TOP HEALTHCARE OPTIONS  
INSURANCE AGENCY INC.  
f/k/a "NATIONAL HEALTH  
ENROLMENT CENTRE"

Defendant.

Case No.

**2:23-CV-05114**

**CLASS ACTION  
JURY TRIAL DEMANDED**

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO  
DEFENDANT'S MOTION TO DISMISS**

COMES NOW Plaintiff Leon Weingrad, by and through the undersigned counsel, and respectfully requests that he be given one additional week, up to and including September 12, 2024, to file a response to the Defendant's motion to dismiss. Counsel for Plaintiff has conferred with counsel for the Defendant, who does not oppose the relief sought.

**CONCLUSION**

WHEREFORE, for the reasons set forth herein, the Plaintiff respectfully requests that the Court provide Plaintiff until and including September, 12, 2024 to respond to the Motion.

RESPECTFULLY SUBMITTED AND DATED this September 3, 2024.

/s/ Andrew Roman Perrong

Andrew Roman Perrong, Esq.

Perrong Law LLC

2657 Mount Carmel Avenue

Glenside, Pennsylvania 19038

Phone: 215-225-5529 (CALL-LAW)

Facsimile: 888-329-0305

a@perronglaw.com

**CERTIFICATE OF SERVICE**

I certify that I filed the foregoing via ECF on the below date, which will send notification to all counsel of record.

Dated: September 3, 2024

/s/ Andrew Roman Perrong  
Andrew Roman Perrong, Esq.  
Perrong Law LLC  
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Glenside, Pennsylvania 19038  
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a@perronglaw.com